



Management and Occupancy Review

Owner Agent Update
April 18-19, 2011

Session Topics

- EIV – Recap
- Handbook Change – Chapter 6
 - ✓ MOR Rating
- Addendum B, Part A
 - ✓ Audience Participation
- General
 - ✓ Waiting List
 - ✓ Lease



EIV Recap

- 5% Voucher Penalty

Retention Of EIV Income Data

Third party verification such as:

- SS Benefit Reports
- New Hire Reports
- Wage and unemployment Income Reports

Must be retained in the tenant file for tenancy and three years after they move out. This applies also to any documentation gathered in any EIV discrepancy report, multiple subsidy report etc.



EIV Recap

Income Reports

- Summary
- Income
- Discrepancy
- No Income
- New Hires

Verification Reports

- Existing Tenant Search
- Identity Verification
 - ✓ Failed EIV Prescreening
 - ✓ Failed Verification
- Multiple Subsidy
- Deceased Tenant



EIV Recap - Reports

| Report Name | When | Master File or Tenant File |
|---|---|----------------------------|
| Failed EIV Prescreening/Failed Verification | Monthly | Master & Tenant |
| Existing Tenant Search | Screening process prior to MI | Tenant or Applicant |
| Multiple Subsidy Report | At least quarterly | Master & Tenant |
| Deceased Tenant Report | At least quarterly | Master & Tenant |
| Income Report | Annual, Interim, 90 days after MI cert is sent to TRACS | Tenant |
| No Income Report | Per O/A policy | Tenant |
| New Hires Report | At least quarterly | Master & Tenant |
| Income Discrepancy Report | Annual and Interim | Tenant |
| Summary Report | Annual & Interim | Tenant |

EIV - Data Retention

- To be retained in a master file:

Once the retention period has expired, O/As must dispose of applicant and tenant files and records in a manner that will prevent any unauthorized access to personal Information, e.g., burn, pulverize, shred, etc.



HUD Handbook 4350.1, Change 2, Chapter 6

Summary of Changes:

- Now consistent with the current HUD 9834, which was originally implemented in 2005 and updated in 2007
- Describes how ratings in each category listed on the HUD 9834 should be determined
- Identifies the reviewing officials, HUD Staff, Contract Administrators, and Mortgagees



HUD Handbook 4350.1, Change 2, Chapter 6

Summary of Changes continued

- Discusses the updated processes occurring prior to the on-site review, such as scheduling and the desk review
- Discusses the process after the on-site review
- Provides guidance for communicating the on-site review results to the owner/agent for consistency with the HUD Desk Monitoring Guide



HUD Handbook 4350.1, Change 2, Chapter 6

Performance Indicators

- Assigned to each category and are used to determine and monitor owner/agent compliance with HUD's requirements. The performance indicators are as follows:

Superior (90-100)

Above Average (80-89)

Satisfactory (70-79)

Below Average (60-69)

Unsatisfactory (59 and Below)



HUD Handbook 4350.1, Change 2, Chapter 6

Management Review Ratings

- To be consistent, HUD has provided performance indicators, rating descriptions, and the weighted percentage each category holds



HUD Handbook 4350.1, Change 2, Chapter 6

Weighted Percentages:

- All categories are assigned a weighted percentage of the overall rating value based on the level of risk for deficiencies
- With the implementation of the change, the lowest rated category may not necessarily be the overall rating



Categories & Rating

| Category | Percentage of Overall Rating |
|--|------------------------------|
| A. General Assistance and Security | 10% |
| B. Follow-up and Monitoring of Project Inspections | 10% |
| C. Maintenance and Standard Operating Procedures | 10% |
| D. Financial Management/Procurement | 25% |
| E. Leasing and Occupancy | 25% |
| F. Tenant/Management Relations | 10% |
| G. General Management Practices | 10% |
| TOTAL | 100% |

The percentages of the overall rating



Categories & Rating

| Category | Performance Indicator | Performance Indicator Value | Percentage of Overall Rating | Calculated Points |
|---|-----------------------|-----------------------------|------------------------------|-------------------|
| General Appearance and Security | Satisfactory | 71 | 10% | 8 |
| Follow-up and Monitoring of Project Inspections | Satisfactory | 71 | 10% | 8 |
| Maintenance and Standard Operating Procedures | Below Average | 62 | 10% | 7 |
| Financial Management/Procurement | Not Rated | 62 | 25% | 16 |
| Leasing and Occupancy | Below Average | 62 | 25% | 16 |
| Tenant Management Relations | Satisfactory | 71 | 10% | 8 |
| General Management Relations | Satisfactory | 71 | 10% | 8 |
| Totals | | | 100% | 71 |

- Satisfactory (70-79)
- Using this method, we have seen the overall rating benefit the owner/agent



Addendum B, Part A

- Completing the form
- 10-day letters
- Submission to HUD
- Audience Participation



Addendum B, Part A

- Type of Property

One type only!

1. This property was designed primarily for:

☐

Exclusively Elderly

☐

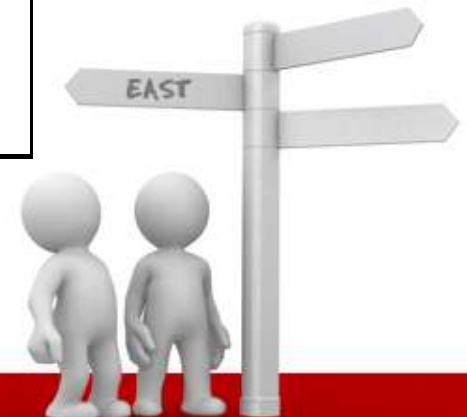
Exclusively Disabled

☐

Elderly and Disabled

☐

Family



Addendum B, Part A

- Currently Occupied

■ 202 ■ Section 8 Elderly Property ■ Family

How to break the numbers down

2. Indicate the number of units currently occupied by client groups below

Exclusively Elderly -

Exclusively Disabled -

Elderly/Disabled -

Near-Elderly Disabled -

Family -

Addendum B, Part A

■ Use Agreement ■ Elderly Preference ■ Occupancy Restriction

3. Is there a use agreement or any other document that indicates that this project must serve only elderly tenants?

☐ Yes ☐ No ☐ Unknown

If yes, specify type of document: Effective Date:

(Please attach a copy of the document(s) indicated above.)

4. If this project is a "covered Section 8 housing project" (see instructions), is there an occupancy preference for the elderly in accordance with Section 651 of Title VI, Subtitle D of the Housing and Community Development Act of 1992? (Refer to HUD Handbook 4350.3, REV-1)

☐ Yes ☐ No

If No, proceed to question 5.

If yes, please indicate:

a. the date of the elderly preference:

b. the number of units that must be reserved for occupancy by non-elderly persons with disabilities , and,

c. the date used to determine the number of units reserved for non-elderly persons with disabilities

5. Is there an occupancy restriction for the elderly in accordance with Section 658 of Title VI, Subtitle D of the Housing and Community Development Act of 1992? (Refer to HUD Handbook 4350.3, REV-1)

☐ Yes ☐ No

Addendum B, Part A

- Distribution of Units




SECTION II – ACCESSIBLE UNITS

Distribution of all wheelchair and other accessible units in the project.

| Bedroom Size | 0 | 1 | 2 | 3 | 4 | 5 | Other | Total |
|---|---|---|---|---|---|---|-------|-------|
| 1. All units | | | | | | | | |
| 2. Total units with project-based rental assistance | | | | | | | | |
| 3. Mobility accessible units | | | | | | | | |
| 4. Vision and/or Hearing accessible units | | | | | | | | |
| *5. (Total Accessible Units) | | | | | | | | |

Addendum B, Part A

































- Exclusive Units for Specified Clientele

| | | |
|--|--|--|
| <p>6. Total Number of Units Exclusively for the Elderly</p> <p></p> | <p>7. Total Number of Units Exclusively for Persons with Disabilities</p> <p></p> | <p>8. Total Number of Units that must be occupied only by Non-Elderly Persons with Disabilities</p> <p></p> |
|--|--|--|



Addendum B, Part A

- Accessible Units - Currently Occupied and Applicants

| | | | | | | | | |
|---|---|---|--|---|---|---|---|---|
| 6. Number of persons on waiting list who have requested <i>accessible</i> units |  |  |  |  |  |  |  |  |
| 7. Number of accessible units <i>occupied</i> by elderly or family tenants |  |  |  |  |  |  |  |  |
| 8. Number of <i>accessible</i> units occupied by non-elderly tenants with disabilities who require the features of the unit |  |  |  |  |  |  |  |  |
| 9. Number of <i>accessible</i> units occupied by elderly tenants with disabilities who require the features of the unit |  |  |  |  |  |  |  |  |

Addendum B, Part A

- Determining the % of Accessible Units

| 10. Percentage of Total Units with Project-Based Rental Assistance | | | | | | | |
|--|--|--|--|--|--|--|--|
| (Total line 2 divided by Total line 1 x 100) <input type="text"/> % | | | | | | | |
| 11. Percentage of Total Units that are mobility accessible | | | | | | | |
| (Total line 3 divided by Total line 1 x 100) <input type="text"/> % | | | | | | | |
| 12. Percentage of Total Units that are vision and/or hearing accessible | | | | | | | |
| (Total line 4 divided by Total line 1 x 100) <input type="text"/> % | | | | | | | |
| *If a unit is both mobility accessible and vision or hearing accessible, count the unit only once in line 5. | | | | | | | |

Addendum B, Part A

SECTION III – PROGRAM ACCESSIBILITY SECTION 504 OF THE REHABILITATION ACT OF 1973

Section 504 Coordinator [24 CFR 8.53 (a)]

1. Does the recipient (as defined in 24 CFR 8.3) employ at least 15 employees?

☐ Yes ☐ No

If “Yes”, answer Question 2.; If “No” skip to Question 3.

2. Is at least one person designated to coordinate its Section 504 responsibilities?

☐ Yes ☐ No ☐ N/A

If YES, provide the person’s name and telephone number below.

Name:

Telephone Number:

Program Accessibility Under Section 504, a federally assisted Housing Development is required to ensure that its program is usable by and accessible to persons with disabilities. This includes, but is not limited to, maintaining housing and non-housing facilities that are structurally accessible for persons with disabilities. The extent to which facilities must be structurally accessible depends in part, on whether they are new, altered, or existing. In addition, owner/agents are required to ensure that effective communication methods are used while communicating with persons with disabilities.

Practice Time

Would it be acceptable for an elderly/disabled property or a 202/8 property to include all occupied units in the category “elderly/disabled” or should the tenants be divided into the specific category?

4. If this project is a “covered Section 8 housing project” (see instructions), is there an occupancy preference for the elderly in accordance with **Section 651** of Title VI, Subtitle D of the Housing and Community Development Act of 1992? (**Refer to HUD Handbook 4350.3, REV-1**)

☐ Yes ☐ No

If No, proceed to question 5.

If yes, please indicate:

a. the date of the elderly preference:









b. the number of units that must be reserved for occupancy by non-elderly persons with disabilities , and,

c. the date used to determine the number of units reserved for non-elderly persons with disabilities

What should the owner do if he/she does not have occupancy records for January 1, 1992 or December 28, 1992?



























Practice Time

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| 6. Number of persons on waiting list who have requested <i>accessible</i> units |  |  |  |  |  |  |  |  |
|---|---|---|---|---|---|---|---|---|

If an applicant is on multiple waiting lists for an accessible unit, would you count the applicant multiple times based on the unit size?



Practice Time

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| 7. Number of accessible units <i>occupied</i> by elderly or family tenants |  6 |  |  |  |  |  |  |  |
| 8. Number of <i>accessible</i> units occupied by non-elderly tenants with disabilities who require the features of the unit |  |  |  |  |  |  |  |  |
| 9. Number of <i>accessible</i> units occupied by elderly tenants with disabilities who require the features of the unit |  |  |  |  |  |  |  |  |

If an O/A included 6 tenants in #7, would #8 & #9 equal the amount in #7 or is each question (#7, #8 & #9) considered to be a separate category?



Waiting List Requirements

- The waiting list must include the following data taken from the application:
 - a. Date and time the applicant submitted an application
 - b. Name of head of household
 - c. Annual income level
 - d. Identification of the need for an accessible unit, including the need for accessible features
 - e. Preference status
 - f. Unit size



Waiting List Requirements

- The owner must document removal of any names from the waiting list with the time and date of the removal
 - Rejected applicants
 - Applicants that moved in
- Special claims may be affected if the waiting list is not properly documented



HUD Model Lease

- Completing paragraphs 7b and 8c
- Strike paragraph (b) if the tenant will not be paying any special charges.
- If the tenant will not receive interest on his/her security deposit (i.e., deposits will not be invested or interest will be deposited in the project's operating account), strike the portion in brackets in paragraph 8.

[Refer to the HUD Handbook 4350.3 REV-1, Appendix 4-E.](#)



Samir Yasa

Director of Compliance and Training

Email: syasa@inquadel.com

Telephone: (317) 656-8802

Fax: (317) 290-4557

